

Executed at Sherman Oaks, California on January 29, 2013.

I oppose plan confirmation because the **Debtor has failed to:**

☐ schedule debts within the limits of 11 USC §109(e); and therefore **ineligible**; and/or Debtor is not eligible to be a Chapter 13 Debtor as follows:

☒ **disclose** [11 USC §521, LBR 1017-1(b)]

☒ assets ☐ creditors ☐ income ☐ prior case

- all assets not scheduled
- No household goods/clothing disclosed /////
- need fmV of business
- File declaration w/ court explaining how design business is valued w/ evid. & disclose on Sch.B

☐ **serve all** creditors with notice and the Plan at least 28 days before the 11 USC §341(a) Meeting of Creditors, FRBPs 2002(b), 7004 and LBR 3015-1(b)(3);

☒ provide the Trustee **documentation of all income** (as well as any contributor's income) seven days before the §341(a) Meeting of Creditors. LBR 3015-1(c)(3), 11 USC § 521;

- 2011 tax return
- 2012 taxes
- short form business report
- need all proof of business income for both debtors
- 2012 year-to-date income/expense
- 2011 year-to-date income/expense
- 6 months bank statements

☒ meet the **business reporting requirements** regarding Debtor's business or self-employment, LBR 3015-1(c)(4);

- short form business report
- need all proof of business income for both debtors
- 2012 year-to-date income/expense
- 2011 year-to-date income/expense
- 6 months bank statements

☒ provide to the Trustee completed copies of the Federal and State **income tax returns**, 11 USC § 1308 and 521, LBR 3015-1(c)(3).

- 2011 tax return
- 2012 taxes

☒ propose a plan that is feasible 11 USC § 1325(a)(6); the plan is **infeasible** because

☐ certain claims are not included and/or the amount provided is insufficient

☐ income is not sufficient enough to fund it

☐ plan payment will not retire debt within term

☒ the plan does not propose treatment and/or properly treat all scheduled, priority and/or secured creditors; and/or plan deficiencies as follows:

- no admin %

☒ propose a plan that represents the Debtor's **best effort** 11 USC §1322; 11 USC §1325

☒ unreasonable and/or unnecessary expenses are scheduled

- **Expenses high**

- **\$280 home maintenance, Emma's School \$100, Tessa's School \$100, \$200**

personal expenses

☐ the budget surplus exceeds the monthly plan payment

☐ comply with the Means Test as required by the Code, In re Kagenveama, 541 F3d 868, and/or In re Lanning, 1330 S.Ct.2464

☐ propose a plan that provides creditors as much as would be received under **Chapter 7** 11 USC §1325(a)(4).

☒ other issues as stated below:

- **Trustee to request interlineations that all tax returns be submitted to the Trustee; all tax refunds to be submitted into the plan and the Debtor will not incur debt greater than \$500 without Court permission.**

- **Amend SFA # 18 for business info**

- **for both debtor & spouse**

- **Amend Schedule B for all assets**

PROOF OF SERVICE

In Re: Nelson Anderson
Case No. SV12-18279-MT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

Elizabeth Rojas
15060 Ventura Blvd.
Suite 240
Sherman Oaks, CA 91403

The foregoing document described as **TRUSTEE'S OBJECTION TO CONFIRMATION; NOTICE OF POSSIBLE DISMISSAL OR CONVERSION** will be served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner indicated below:

On February 01, 2013, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Nelson Anderson
5395 Churchwood Drive
Oak Park, CA 91377

Yelena Gurevich
Consumer Action Law Group PC
450 N Brand Blvd Ste 600
Glendale, CA 91203

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: February 01, 2013

/s/ Patricia Trujillo
